

To Stacie Peterson/R3/USEPA/US@EPA

bcc

Subject Re: 5-21-08

Hello Stacie -

Below are the responses to the email on 5-21-08.

1. Currently there are 5 drums of dirty MEK at the Baylis facility. The generation dates for the 5 drums are (1) 10/25/07, (2) 12/28/07, (3) 02/29/08, (4) 03/25/08, (5) 05/13/08.

Drums #1-3 have been scheduled for hazardous waste pickup on June 3, 2008.

A copy of the manifest will be forwarded to you when generated.

Drums #4-5 will be recycled prior to the 90 day accumulation.

2. The understanding, as stated, is correct with the following exception:

The following statement is inaccurate, "Once the MEK is saturated with lacquer or considered dirty, and the operator has determined that it is no longer effective..."

The statement should read, "The MEK is considered dirty when the operator determines it no longer dissolves the lacquer in a reasonable amount of time."

Notes:

Dirty MEK which has been transferred to the drum is not spent nor no longer effective. Should the operator not have any clean MEK available, they would continue using the dirty MEK instead of transferring it to the drum. It would be effective but take more time. This has happened in the past but we have no records to support this.

All dirty MEK transported to Pulaski was recycled and over 95% of it was used at Pulaski. This was supported by the 21 drums of MEK purchased at Baylis during the time period since 09/06 and as stated in Additional Response #6. During this time period the amount of MEK purchased for Pulaski was insufficient to support production since we relied on the dirty MEK sent from Baylis.

Regarding the nickel acetate sludge: We will be more thorough in our analysis and determination of this waste stream in future hauls.

Mike Castor



To Michael Castor <easternplating@yahoo.com>

bcc

Subject 5-21-08

Hello Mr. Castor. Thanks again for the responses to my last set of questions. I have a remaining couple questions and a few things I want to make you aware of.

- 1. In the response to April 3, 2008 Additional Information Request, you stated that you have/had 3 drums of dirty MEK at Baylis on 4/22/08. In the notes, you stated that the first drum was generated on October 25, 2007. Please state when the other 2 drums were generated. Also, please send me a copy of the manifest once these drums are shipped off-site.
- 2. I just want to make sure I am understanding all the terminology and handling of the MEK. "Dirty" MEK is lacquer-saturated MEK. Once the MEK is saturated with lacquer or considered "dirty", and the operator has determined that it is no longer effective, it is removed and placed into 55-gallon drums. The "dirty" MEK in these drums is then either shipped off-site for disposal or placed into the distillation unit. Although you stated in the last response that the "dirty" MEK can still be used in the initial soak, all "dirty" MEK observed during the inspections was either placed into the distillation unit or sent off-site for disposal. Also, all the "dirty" MEK that was transported from the Baylis facility to the Pulaski facility were placed in the distillation unit none of the "dirty" MEK was reused in the initial soak at the Pulaski facility.

Please state whether or not the above understanding is correct. If one or more of the above statements is not accurate, for each such statement please: a) indicate which statement(s) is inaccurate; b) describe, in detail, your reasons as to why such statement is inaccurate, and c) provide documentation supporting any assertion of inaccuracy.

Please be advised - Based on the manifests I reviewed for 2004-2007, the Baylis site would be subject to the MD generator requirements and federal large quantity generator requirements. Therefore, you can only store hazardous waste onsite for 90-days. You need to ship these drums off-site ASAP since the first drum has been accumulating onsite since October 25, 2007 (approximately 180 days).

In addition, in the response to the April 3, 2008 Additional Information Request, you stated that the nickel acetate/nickel hydroxide sludge was determined to be nonhazardous. You provided a lab analysis, however, it did not provide any results for pH. I contacted the TSDF on this waste stream. According to the TSDF, this waste stream was shipped off-site as nonhazardous on manifests 55062 and 89360. However, according the TSDF's fingerprinting analysis, this waste stream associated with manifest 55062 and 89360 had a

pH of 14. The TSDF identified the material as hazardous waste and wrote discrepancies to add the EPA waste code of D002 (for corrosivity). That is probably why your most recent waste profile from the TSDF identifies the waste as hazardous. Please be sure to do a proper waste analysis/determination for this waste stream.

Please provide this information regarding the 2 questions by COB on May 30, 2008.

Thanks.Stacie Peterson, Environmental Engineer
US EPA Region III - RCRA Compliance & Enforcement (3WC31)
1650 Arch Street
Philadelphia, PA 19103
(215)814-5173 - Phone
(215)814-3163 - Fax



- To Michael Castor <easternplating@yahoo.com>
- cc Andy Amasia <andy.amasia@gmail.com>, _Wellington Abhilashi <ep_labs@yahoo.com>, _Karen <ep_pulaski2@yahoo.com>

bcc

Subject Re: December 11, 2007 Inspections

Thanks, Michael. One last question that I forget to put on the last e-mail. For the time(s) you transported the MEK from the Baylis Facility to the Pulaski Facility, you stated that you did not manifest the MEK because Eastern did not consider it waste. Did you prepare a Land Disposal Restriction (LDR) notification(s) for the times that the MEK was transported? If so, please state when it was prepared and provide copies of those LDRs.

Thanks again.

Stacie Peterson, Environmental Engineer US EPA Region III - RCRA Compliance & Enforcement (3WC31) 1650 Arch Street Philadelphia, PA 19103 (215)814-5173 - Phone (215)814-3163 - Fax

Michael Castor <easternplating@yahoo.com>



Michael Castor <easternplating@yahoo.com

05/09/2008 11:11 AM

To Stacie Peterson/R3/USEPA/US@EPA

cc _Karen <ep_pulaski2@yahoo.com>, _Wellington Abhilashi <ep_labs@yahoo.com>, Andy Amasia <andy.amasia@gmail.com>

Subject Re: December 11, 2007 Inspections

Hello Stacie -

We received the additional questions and will forward the responses to you on the due date.

Thanks for the considerate comment regarding the additional questions. Preparing the responses to all of the questions has exposed serious deficiencies in our business which we have remediated or are in the process of remediating. The whole experience has made us a better business.

Regards, Mike Castor

Peterson.Stacie@epamail.epa.gov wrote:

Hello Mr. Castor. Thank you for providing the additional response. However, I still have a few more questions - This should be the last of them, but I can't make any promises.



To Michael Castor <easternplating@yahoo.com>

CC

bcc

Subject December 11, 2007 Inspections

Hello Mr. Castor. Thank you for providing the additional response. However, I still have a few more questions - This should be the last of them, but I can't make any promises.

Please provide a reponse to my questions by Monday, May 19th. If you have any further questions, please give me a call.

Thanks.



58AdditionalQuestions.doc

Stacie Peterson, Environmental Engineer
US EPA Region III - RCRA Compliance & Enforcement (3WC31)
1650 Arch Street
Philadelphia, PA 19103
(215)814-5173 - Phone
(215)814-3163 - Fax

May 8, 2008 Additional Questions for Eastern Plating

- 1.) For the transport of MEK that was to be recycled, from the Baylis facility to the Pulaski facility, you revised your answer to state that 10 drums were transported.
 - a. Please state the number of times/shipments that MEK was transported.
 - b. Please provide the dates that shipment occurred from the Baylis facility to the Pulaski facility.
 - c. State how long each drum sat at the Pulaski facility before recycling in the distillation unit occurred.
- 2.) Has all MEK that was transported from the Baylis facility to the Pulaski facility been recycled in the distillation unit?
- 3.) At the Baylis facility, in Response 10 and 18 to the initial February 8, 2008 Information Request, it is stated that the "dirty" MEK in the MEK parts cleaners is pumped into 55-gallons for "storage, for reuse" when Miccroshield removal can no longer be achieved in a reasonable amount of time. In addition, it is stated that the lacquer saturate MEK is "still usable" when it is segregated for recycling. Please explain how this "dirty" MEK is reused and/or still usable when it is segregated for recycling in the distillation unit.
- 4.) At the Baylis facility, as part of the wastewater treatment process, are any sludges and/or solids generated? If so, please answer the following:
 - a. Provide a detailed description of the process(es) that generate the sludges and/or solids.
 - b. State whether a "waste determination" and "LDR determination" was made for the sludges and/or solids.
 - c. If a "waste determination" and "LDR determination" were made for the sludges and/or solids, state when *each* such determination were made.
 - d. Were the sludges and/or solids determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with *each* such hazardous waste.
 - e. State whether *each* hazardous waste determination was based on the generator's knowledge of the process that generated the waste or on analytical results. If a determination was made on the basis of process knowledge, describe in detail the scientific rationale for such a determination. If the determination was based on analytical results, describe the sampling procedures and provide copies of any and all such results.

- f. Please state if any sludges and/or solids were shipped off-site and the date of the shipment(s). If any sludges and/or solids generated have never been shipped off-site, state the current location and why such materials have not been shipped off-site.
- g. Were the sludges and/or solids shipped off-site for recycle (i.e., reclaim, re-use), treatment, storage or disposal?
- h. Provide copies of <u>all</u> bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied <u>each</u> off-site shipment of this waste.
- During the December 11, 2007 EPA inspection at the Baylis facility, it was explained that the Cardinal Group pumps out the spent chemical and any hazardous wastewaters directly from the tanks (approximately once per year). Upon reviewing the manifests and LDRs, EPA was unable to determine if the pump out spent chemical and hazardous wastewaters were manifested.
 - a. For the time period of May 2003 Present, please state if such waste was manifested as a hazardous waste. If so, please provide such manifests and LDRs or identify the manifests and LDRs that have been provided to EPA that include this waste stream.
 - If the waste stream has not been manifested, please answer the following:
 - b. State whether a "waste determination" and "LDR determination" was made for the spent chemical and any hazardous wastewaters.

- c. If a "waste determination" and "LDR determination" were made for the spent chemical and any hazardous wastewaters, state when such determinations were made.
- d. Were the spent chemical and any hazardous wastewaters determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.
- e. State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste or on analytical results. If a determination was made on the basis of process knowledge, describe in detail the scientific rationale for such a determination. If the determination was based on analytical results, describe the sampling procedures and provide copies of any and all such results.
- f. Were spent chemical and hazardous wastewaters shipped off-site for recycle (i.e., reclaim, re-use), treatment, storage or disposal?
- g. Provide copies of <u>all</u> bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied <u>each</u> off-site shipment of this waste.



To Stacie Peterson/R3/USEPA/US@EPA

bcc

Subject Re: December 11, 2007 Inspections - Part 1 of 2

Hello Stacie -

Attached are our responses to the 5 additional questions sent on May 8, 2008 and the additional question sent in an email on May 12.

I was not able to fit all of the attachments into this email.

There will be an email following with the remaining attachments.

Regards,

Mike Castor

Peterson.Stacie@epamail.epa.gov wrote:

Hello Mr. Castor. Thank you for providing the additional response. However, I still have a few more questions - This should be the last of them, but I can't make any promises.

Please provide a reponse to my questions by Monday, May 19th. If you have any further questions, please give me a call.

Thanks.

(See attached file: 58AdditionalQuestions.doc)

Stacie Peterson, Environmental Engineer
US EPA Region III - RCRA Compliance & Enforcement (3WC31)
1650 Arch Street
Philadelphia, PA 19103
(215)814-5173 - Phone
(215)814-3163 - Fax

Michael W. Castor President **Eastern Plating Company, Inc.** 410-342-4107 410-342-0105 fax 22.0

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5 Additional Questions-Responses.pdf Attachment 1 a.pdf Attachment 3 a.pdf Attachment 4 a.pdf Attachment 5 a.pdf

EASTERN PLATING COMPANY, INC. 5 Additional Questions – Responses

1a. We believe there were 9 shipments of the 10 drums of dirty MEK transported from the Baylis Facility to the Pulaski Facility.

This was based on reports from one of the drivers who transported the material and one of the forklift operators, as follows:

One of the van drivers reported making 4 shipments of 1 drum and 1 shipment of two drums. This driver loaded the van and hauled the drums on these shipments.

The Baylis Forklift Driver reported loading 4 shipments of 1 drum. He did not drive the van and there was a different van driver than reported above.

We do not have records to support this.

- 1b. We are uncertain of the specific dates or weeks when the shipments occurred. We estimated a time frame for each shipment based on our dirty MEK policy and purchase records for Baylis. Attachment 1a, paragraphs 1 and 2, contains the details of our estimate along with the time frame each shipment probably occurred.
- 1c. We believe the drums of dirty MEK sat at Pulaski waiting to be recycled for a time period of 2 6 weeks. Attachment 1a, paragraph 3, contains a statement of how we made this determination. We have no records to support this.
- 2. All the dirty MEK that was transported from the Baylis Facility to the Pulaski Facility has been recycled in the distillation unit.
- 3. The "dirty" MEK is still usable when we segregate it for recycling because it still has solvent capabilities for our process. Attachment 3a contains a statement from our Assistant General Manager regarding the "dirty" MEK.
- 4. The Baylis Facility Wastewater Treatment System generates suspended solids from pH neutralization. The suspended solids are discharged as part of the treated effluent. There are no suspended solids that are segregated and collected as sludge.
 Our Baltimore City Wastewater Permit does not require monitoring of suspended solids.
 Attachment 4a contains two pages from the Permit that identifies our monitoring requirements.
- 5. Manifests Attachment 5a contains the manifests for the hauled chrome from 2003 Present. Note that in April 2008 and September 2006, there was also chrome hazardous waste hauled in drums.
 - LDR Attachment 5b contains our Land Disposal Notification/Certification Form for the hauled chrome. Our chrome haul supplier reported that we need only one LDR per profile. A copy of their statement is included in this attachment.

Non-Hazardous Certification

Attachment 5c contains Non-Hazardous Certifications for 2008, 2007, 2005, 2004. Copies of the Certifications for 2006 and 2003 will be forwarded once we receive copies from our supplier.

EASTERN PLATING COMPANY, INC. 5 Additional Questions – Responses

6. (Response to email sent on May 12, 2008)

For all drums of dirty MEK transported from the Baylis facility to the Pulaski facility, there were no Land Disposal Restrictions Notifications generated. We did not identify the material as waste, there was no intent to dispose of it and the material was not disposed.

Attachment 1a



Print - Close Window

Date:

Mon, 19 May 2008 11:05:05 -0700 (PDT)

From:

"Karen Keffer" <ep_pulaski2@yahoo.com>

Subject: MEK

To:

"Michael Castor" < easternplating@yahoo.com>

Michael

I do not know the exact date dirty MEK was transported from Baylis to Pulaski, however I did go back and look at all of the MEK purchases from Baylis. Baylis had a rule of no more then 2 drums of dirty Mek were allowed to be held there at any one time, the assumption 3 drums of clean MEK will produce about 2 drums of dirty MEK, to my knowledge we only transported 1 drum at a time, based on this I believe we would have transported Mek as follows:

1 ea 55 gallon drums between 09/30/06 and 11/06/07 2 ea 55 gallons drums between 11/08/06 and 01/11/07 2 ea 55 gallons drums between 02/03/07 and 03/23/07 2 ea 55 gallons drums between 03/24/07 and 05/31/07 2 ea 55 gallons drums between 06/01/07 and 8/04/07 1 ea 55 gallons drums between 08/05/07 and 11/13/07

I would say the transported drums from Baylis in most cases were probably being recycled within 2 - 3 weeks from the time we received them. Pulaski stopped purchasing MEK shortly after we started recycling, we had 2 drums on hand for recycling , we were recycling about 12 gallons per day , some days Richard would get a second runs in . Richard quit in July of 07. After July the drums may have taken as long as 4 - 6 weeks to recycle since we were only getting 1 run per day.

Thanks Karen

Attachment 3a



Print - Close Window

Date:

Wed, 14 May 2008 07:17:17 -0700 (PDT)

From:

"Karen Keffer" <ep_pulaski2@yahoo.com>

Subject: MEK

To:

"Michael Castor" <easternplating@yahoo.com>

Michael

The MEK in the drums for recycling have not been completely saturated with lacquer, the MEK can still be used by soaking the parts longer. After purchasing the recycler and having clean MEK on hand constant, we found it more productive not to allow the MEK in our working tanks to become so saturated with lacquer, we began switching out the tanks more frequently reducing the soak time, this helped us with our daily delivery requirements. If we were to ever get low on clean MEK, we could certainly use the MEK in the recycling drums as is for our initial soak.

Thanks Karen

Attachment 4a

Effective: 04/01/04 Expires: 03/31/09

ATTACHMENT C -

MONITORING SCHEDULE

INDUSTRY NUMBER 1-08642 EASTERN PLATING CO., INC.

THE PERMITTEE IS AUTHORIZED TO DISCHARGE THE FOLLOWING TO THE CITY OF BALTIMORE SEWER SYSTEM: Rinsewaters from anodizing, hard coating, chromating and passivating. Spent acid, alkastand and dye solutions. Rectifier cooling water by way of the process rinse tanks.

SAMPLING LOCATION: Sampling manhole located at the corner of the 1200 block of Highland. Avenue and the alley indicated as #1 on the attached diagram.

THE COMPANY IS REQUIRED TO SAMPLE FOR THE FOLLOWING PARAMENTER AT THE INDICATED FREQUENCY:

| PARAMETER | SAMPLE TYPE | DURATION | FREQUENCY | COMMENTS |
|---|--|----------|--|--|
| BOD | e de la companya del companya de la companya del companya de la companya del la companya de la c | | | |
| SUSPENDED SOLIDS | | | | |
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| рН | Grab | 4 days | Quarterly | |
| ACID PHENOLS | Composite | 1 day | Quarterly | Or fulfill TTO certificat |
| BASE NEUTRAL EXTRACTABLE ORGANICS | Composite | 1 day | Quarterly | Or fulfill TTO certification |
| PESTICIDES/PCBs | Composite | 1 day | Quarterly | Or fulfill TTO certification |
| VOLATILE ORGANICS | Grab | 1 day | Quarterly | Or fulfill TTO certification |
| Cd | Composite | 4 days | 1 ^{et} & 3 rd quarters | |
| Cu | Composite | 4 days | Quarterly | |
| Cr, TOTAL | Composite | 4 days | Quarterly | |
| Pb | Composite | 4 days | Quarterly | |
| Hg | | | TRANSPORTATION AND ANALYSIS OF THE PROPERTY OF | |
| MI | Composite | 4 days | Quarterly | The state of the s |
| Zn | Composite | 4 days | Quarterly | |
| Ag | | | | |
| CN, TOTAL | Grab | 4 days | 1 st &3 rd quarters | |
| TOTAL METALS | Composite | 4 days | Quarterly | |

COMPOSITE SAMPLES SHALL REPRESENT THE WASTEWATER CHARACTERISTICS OVER THE PERIOD OF DISCHARGE NOT TO EXCEED 24 HOURS.

Attachment 4a

ATTACHMENT D -

DISCHARGE EFFLUENT LIMITATIONS

A. During the term of this permit, the discharge sampled at the location(s) specified in the monitoring schedule and utilizing the sample type indicated in same, shall not exceed the following effluent limitations:

Effluent Limitations

| | Daily | 4 Day |
|------------------------------------|----------------|-------------|
| Parameter | Maximum \1\ | Average \1\ |
| | | |
| Cadmium (Cd) | 1.2 | 0.7 |
| Lead (Pb) | 0.6 | 0.4 |
| Zinc (Zn) | 4.2 | 2.6 |
| Copper (Cu) | 4.5 | 2.7 |
| Chromium (Cr), Total | 7.0 | 4.0 |
| Nickel (Ni) | 4.1 | 2.6 |
| Total Metals | 10.5 | 6.8 |
| Cyanide (CN), Total | 1.9 | 1.0 |
| Total Toxic Organics (TTO) | 2.13 | |
| Volatiles | | |
| Acid Phenols | | |
| Base Neutrals | | |
| Pesticides/PCBs | | |
| Mercury (Hg) | 0.01 (LL) | |
| Silver (Ag) | 1.2 (LL) | |
| Total Petroleum Hydrocarbons (TPH) | 100 (LL) | |
| pH (Standard Units) | 12.5 - 5.0(LL) | |

- B. The effluent limitations are based on:
 - 1.) Pretreatment standards for the electroplating category (40 CFR 413)
 - 2.) Local limits (LL)
- C. The discharge shall comply with all other applicable laws, regulations, standards and requirements contained in § 1-2 of Article 25 of the Baltimore City Code (2000 ed., as amended).
- \1\ mg/L (ppm) unless otherwise noted

Form Approved. OMB No. 2050-0039 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 3. Emergency Response Phone 1. Generator ID Number MDD063215453 UNIFORM HAZARDOUS 5850 WASTE MANIFEST 110-918-1012 Generator's Name and Mailing Address nerator's Site Address (if different than mailing address) Eastern Plating Co. 1200 South Baylis Street, Baltimore, MD 21224 Generator's Phone: 410-342-4107 6. Transporter 1 Company Name Envirite of Pennsylvania, Inc. U.S. EPA ID Number PAD010154045 U.S. EPA ID Number 7. Transporter 2 Company Name 8. Designated Facility Name and Site Address. U.S. EPA ID Number Envirite of Pennsylvania, Inc. 730 Vogelsong Road, York, PA 17404 PAD010154045 717-846-1900 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10. Containers 11. Total 12. Unii 13. Waste Codes and Packing Group (if any)) Quantity Wt./Vol. No RQ, Waste chromic acid solution, 8, UN1755, III (D002, D002 D005 X u Me 4.90 D005, D007, D008). CXXX7 D008 ٠,, 14. Special Handling Instructions and Additional Information ERG# 154 Y#3245 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Offeror's Printed/Typed Name VCIII Export from U.S. Port of entry/exit Transporter signature (for exports only): Date leaving U.S.: 17. Transporter Acknowledgment of Receipt of Materials Transporter 2 Printed/Typed Name 18. Discrepancy 18a. Discrepancy Indication Space Туро Residue Partial Rejection ___ Full Rejection Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Month

GENERATOR'S INITIAL COPY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

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| ≥ | 18b. Alternate Facility (or Genera | tor) | | | maneco (Neterent | Tunnel. | U.S. EPA ID | Number | | | |
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| FA | Encility's Phone | | | | | | 1 | | | | |
| | Facility's Phone: 18c. Signature of Alternate Facilit | y (or Generator) | | | | | | *** | Mon | th Day | Yea |
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| DESIGNATED FACILITY | 40 (Income a 20) 5 | | | | | · · · · · · · · · · · · · · · · · · · | | | | | |
| ES | 15. Hazardous Wasta Report Ma | nagement Method Codes (i.e., codes for ha | azardous waste treatment. | | recycling systems) | | | | | | |
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| | | Operator: Certification of receipt of hazard | ous materials covered by | | | m 18a | | | | | |
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| 1 1 | | | | | | | | | | | |

Y#3245

Please print or was. (Form designed for use on elite (12-piton) typowriter.) Form Approved, OMB No. 2050-0039 UNIFORM HAZARDOUS | 1 Generator ID Number 2. Page * of [3 Emergency Response Phone WASTE MANIFEST MDD063215453 410-342-4107 5 Generator's Name and Mailing Address Gunerakor's Site Address (didlerent than making address Eastern Plating Company 1200 South Baylis Street Baltimore, MD 21204 Generator's Phone (410) 342-4107 5 Transporter 1 Company Name U.S. EPA ID Number Envirue of Pennsylvania, Inc. PAD010154045 7. Transporter 2 Company Name U.S. FPA IO Number Jesignated Facility Name and Sile Address U.S. EPA ID Number Envirite of Paintylvinia, Inc. "NO Vingeliaving Road YOR PA 17404 Facalty's Phone: 17171846-1906 95, U.S. DOT Description (including Proper Shipping Name, Hazard Class, © Number, 18. Containers 11. Total 12. Unit 13. Waste Codes and Packing Group (1 any)), 47.4 WA AND MI. Type RQ Waste Chromic acid solution, (Do02, D005, D007, D008). D002 EXHA CHOR 8 3021744, 10 D(+)3 4.XX 14. Special Handling Instructions and Additional Information 122G F154 15 GENERATOR'S/OFFEROR'S CERTIFICATION: Thereby declare that the contents of the consequence and his declared and virtual declared and are classified, backaged. marked and libered blackhood, and are in all respects in proper condition for liberescent according to explainable international and national governmental regulations. If export showers and familitial Primary Exponent certify that the contents of this consignment conform to the terms of the absenced EPA Accrowledgment of Consent. I certify that the wasto minimization statement icontified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Conerator's Offeror's Printed Typed Name Signal re-Liev 109 107 106 EN Parage 18, international Shipments Typor: lo U S. Export from U.S. Post of entrylexit hansporter signaturu (for exports only). Date leaving U.S. 17. Transporter Advirowledgment of Receipt of Materials Transporter I, Printed Typed Home Month Day Stream Michael K.Brett 109/07/04 Transporter 2 Printed Typed Name 18 Discrapancy 18a. Discrepancy Indication Space Resta ☐ type Partia Rejection Full Najection 29,900 Vaniles: Reference Number: U.S. EPAID Number 18b. Attemate Facility (or Generator) 18c Signature of Alternate Facility (or Generator) More ₽∌y 19 Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 4111 20 Designated Facility Owner or Operator. Certification of receipt of nazaglous materials covered by the manifest except as noise in item 18a Word Name Signature 109107106 16 h 1 Dev EPA Form 8700-22 (Rev. 3-05). Previous editions are obsolete DESIGNATED FACILITY TO GENERATOR

| P198 | ase print or type. (Form desig | ned for use on elite (12-pitch) typewriter.) | A A A A | | - Divers | A Marient | | Approved. | UMB NO. | 2000-0000 | | | |
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| † | UNIFORM HAZARDOUS | 1. Generator ID Number 2. Page 1 of 3. Emergency Response Phone 1. (418) 358-9178 | | | | 4. Manifest Tracking Number 000746930 JJK | | | | | | | |
| | WASTE MANIFEST | MDD063215453 | | | | | | <u> </u> | <u> </u> | <i>)</i> \ | | | |
| П | 5. Generator's Name and Mailing Address | | | | | | | | | | | | |
| П | Baltimore, MI | • | U. | 3.1 - 5.8 ₀₀ | | | | | | | | | |
| Ш | 1.6 | (0) 342-4107 | 1 | | | | | | | | | | |
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| ľ | | | | andest Referenc | e Number: | | | | | | | | |
| È | 18b. Alternate Facility (or Gene | rator) | | | | U.S. EPAID N | umber | | | | | | |
| 텅 | | | | | | | | | | | | | |
| ₹ | Facility's Phone: | | | | | | | | | | | | |
| 旧 | 18c. Signature of Alternate Fac | ility (or Generator) | | | | | | Mod | ndih Day | Year | | | |
| [₹ | | | 7 | | | | | | | | | | |
| DESIGNATED FACILITY | 19. Hazardous Waste Report M | lanagement Method Codes (i.e., codes for hazardous | s waste treatment, disposal, and rec | cycling systems) | | | | | | | | | |
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| ı | H141 | H16 | 11 | · H1 | 41 | | | ₩ | 11 | | | | |
| Ш | 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a | | | | | | | | | | | | |
| | Printed/Typed Name | , | Signature | 1//0 | | K / | | Mor | nth Day | Year | | | |
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PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION Bureau of Land Recycling and Waste Management P.O. Box 8550 Harrisburg, PA 17105-8550 OFFICIAL PENNSYLVANIA MANIFEST FORM

Form approved CM9 No. 2050-0039

| | PAID No. 1 5 4 5 3 7/ | Macriflest cument No. | 2. Page of | not required to required by S | y Federei tate law. | ioid red border is law but may be |
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| 3. Generators Name and Malling Address Sastern Plating Company 1200 South Bavlis Street | , , | | | PAH 1 | 18 | 82 |
| Balt Imore, MD 21224 4. Generation Phone (410) 342-4107 | | | B. State | Gen. ID | | |
| S. Transporter 1 Company Name Envirite of Pennsylvania, Inc. P A | 6 US EPA ID Number | 0 4 5 | | Trans. 10 | ij! | 549 |
| 7. Fransporter 2 Company Name | à, US EPA ID Number | | D. Tren | sporter's Phone (7) Trans. ID | 17) 9 | 146-1900 |
| Designated Facility Name and Site Address | 10. US EPA ID Number | | P/ | N-AH | | |
| 9. Designated Facility Name and Site Address Envirite of Pennsylvania, Inc. 730 Vogelsong Road | | | G. State | Facility's (D |) | |
| York, PA 17404 P A | D016154 | | | itys Phone(717) | | -1900 |
| York, PA 17404 P A 11. US not Description (Including Proper Shipping Name, Hazard Class, and ID HM | Number) | 12. Conta | Type | 13. Total Quantity | 14. Unit WL/Vol | I, Waste No. |
| RQ, Waste Chromic acid solution | n, (D002, D005, | | | | | D002. D005, |
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| G E N E R A T O R d. J. Additional Descriptions for Materials Listed Above | | | a. 1-2 | 1 D20 c | | |
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| 24 Hour Emergency Response Phone #: | 410 517 201 | 8 Eve | /we | ic rads | | |
| 200 # 0/2707 HTWH | 236 | | | | | |
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| 16. GENERATOR'S CERTIFICATION: I hereby declare that the co- classified, packed, marked and labeled and are in all respects in proper to if it am a large quantity generator, if certify that I have a program in pli- practicable method of treatment, is the environment. Ost, if I am a small quantity generator, I have made a go- to me and that I can afford. Printed Typed Name | torane, or disposal currently availa | itile to me who | THUMBER OF THE | : Ime uresent and tutur | a threat of | o numan neam and |
| printed Typed Name Long J. Land J. Paneic | Signature | | | | MONTH | DAY YEAR |
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| L 20. Facility Owner or Operator: Certification of receipt of hazardous materials co | vered by this manifest except as no | oted ip item 19. | | | | |
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| Y KIRDY & NEWSHALL | | PH | | Transition - Administration (AMP) | 10 | 07 05 |

WASTE MAN FEST MED D Eastern Plating Company 1700 South Bayir Street Baltimore PAD 21214 PAH -027912 PA-AH evivents, Inc. | P'A D'0"1 0 1 5 4 504 # 0549. nucle's Proce (717) 846-1900 PA AH SERVICE Enviring of Fernandivania, Inc. 730 Wogalsong Road Tork, F7A717404 RQ, Waste Chromic ecid solution, (D002, D0)2, D007, D007, D008), 8, UN1786, III D002, D005. Ma VC TO TO TO TO 0 (40) 342 4107 14. GENERATOR'S CENTIFICATION: 10 to dissected (social matter) and advance and are in 4. and a single posterior (amounts). Serify has precisable and the United association (serification for another many City VI and a small (serification to another many City VI and a small (serification) agrees to the same feet of a story. No was L. Present 10,000

| P Levinope REV. 7/80 | ENNSYLVANIA DEPARTMENT OF ENVIR Bureau of Land Recycling and W P.O. Box 8550 Harrieburg, PA 17105 OFFICIAL PENNSYLVANIA MA | este Managemei -8550 | | on up | 32 | Form approved. OMB No. 2050-0039 |
|--|--|---|---|--|----------------------|-------------------------------------|
| 3. Generator's Namb and Mailing Address | 1. Generator's US EPA ID No. D. 0 6 3 2 1 5 4 5 3 9 Rastern Plating Company 1200 S. Bayliss St. Baltimore, MD 21224 | Maintheat Document No. | 2. Page 1 of 3 A. State 6 | PAG 294 | Federal I to hav. | |
| A. Generator's Phone (410) 342-43 6. Transporter 1 Company Name Environment of Pennsylvania, 7. Transporter 2 Company Name 9. Designated Fedility Name and Site Address | 6. US EPA ID Numbe | 4 0 4 5 | D. Trenes E. State 1 | -AH 05 | | 46-1900 |
| Envirite of Pennsylvania, 730 Vogelsong Rd. York, PA 17404-1725 | PAD01015 | 4 0 12.03 | G. State I | portor's Phone (Feelity's ID 18. 19. 10. | 14.0 | #6-1900 Waste No. |
| RQ, Waste Chromic Acid X PGIII (RQ-D002, D007) | | Ha. | Type | × 2460 | G | * |
| 6. | | | | | | D 0 0 2 |
| d. | | | | | | |
| J. Additional Descriptions for Materials Listed Above 11a BRG#154 Chromic Acid | | | 131 | 080 | Red Abox | |
| 16. Special Handling Instructions and Additional Inform Add'1 Codes *D007, D* 11a) Approval: Y#3245 (Chr | 05, DM8 | M | O CER | #00545 | | |
| Sine rgancy Response Phone No. 16. GENERATOR'S CERTIFICATION: I'm classified, packed, marked and labeled and are in if I am a large quantity generator, I certify that practicable and that I have selected the practicable the environment; OR, If I am a small quantity gene to me and that I can afford. | | e fully and sourcests by according to appli toxicity of waste ge which waste generation and | classificable interinerated to a minimizes diselect the | | | |
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| 16. Transporter & Automotive American of Motorial Printed/Typed Name 19. Discrepancy Indication Space | Signature | | | | MONTH | DAY YEAR |
| 20. Facility Owner or Operator: Certification of receipt o | virite Scale | as noted in item 18. | | | | |
| Printed/Typed Name Ren Bewy | Signature | 110 | | | MONTH 07 | DAY YEAR |



To Stacie Peterson/R3/USEPA/US@EPA

bcc

Subject Re: December 11, 2007 Inspections - Part 2 of 2

Here are the remaining two attachments.

Peterson.Stacie@epamail.epa.gov wrote:

Hello Mr. Castor. Thank you for providing the additional response. However, I still have a few more questions - This should be the last of them, but I can't make any promises.

Please provide a reponse to my questions by Monday, May 19th. If you have any further questions, please give me a call.

Thanks.

(See attached file: 58AdditionalQuestions.doc)

Stacie Peterson, Environmental Engineer
US EPA Region III - RCRA Compliance & Enforcement (3WC31)
1650 Arch Street
Philadelphia, PA 19103
(215)814-5173 - Phone
(215)814-3163 - Fax

Michael W. Castor President **Eastern Plating Company, Inc.** 410-342-4107 410-342-0105 fax





Attachment 5b.pdf Attachment 5c.pdf



Attachment 5b

Print - Close Window

Date:

Mon, 19 May 2008 13:14:07 -0700 (PDT)

From:

"Wellington Abhilashi" <ep_labs@yahoo.com>

Subject: Fw: Land bans

To:

"Mike Castor" <easternplating@yahoo.com>

---- Forwarded Message ----

From: Corie L. Hilyer <clh@thecardinalgroupinc.com>

To: ep_labs@yahoo.com

Sent: Monday, May 19, 2008 3:14:27 PM

Subject: Land bans

Wellington,

Hello. I spoke with Envirite in regards to the landbans. They said that a land ban is only needed with the first initial shipment and is not needed with ever shipment but if the process changed on how the waste was being generated then they would require a new land ban.

Thanks

Corie Hilyer The Cardinal Group, Inc. 828 N. Hanover Street Pottstown, PA 19464 Phone: 484-945-0575

Fax: 484-945-0577

Printed Name:

LAND DISPOSAL NOTIFICATION/CERTIFICATION FORM for PROCESS WASTES Attachment 5b

Envirite of Pennsylvania, Inc.

The purpose of this document is to provide notification — and if appropriate, certification — relating to the waste referenced herein, as required by the land disposal restrictions codified at 40 CFR Part 268.

Instructions for completing this form: For each waste stream referenced on this form, please complete Sections 1 through 5, Section 7, and other sections as applicable. To complete Section 7, please note that only one type of notification (and/or certification) will apply to a waste stream, so please consult the following table for further instructions. Complete Section 6 only if a waste subcategory applies. Complete Section 8 only for characteristic wastes, if required by regulation. Signatures must be provided only by an authorized generator representative.

| If the waste, | and/but if, | then also complete section |
|-----------------------|--|----------------------------|
| is F or K code waste, | and it fails LDRs, | . 9 |
| is F or K code waste, | and it meets LDRs, | 10 |
| is D code waste, | and it fails LDRs for the hazardous characteristic & UHCs, | 9 |
| was D code waste, | and it meets LDRs for the D code, but fails for UHCs, | 11 |
| was D code waste, | and it meets LDRs for both the D code and all UHCs, | . 12 |

SECTION 1 Generator's Name: Eastern Plating Co. Generator's EPA #: MDD063215453 Pick-up Address: 1200 South Baylis Street; Baltimore, MD 21224 Manifest Document Number: 94213 State Manifest Document Number: SECTION 6 SECTION 2 SECTION 3 SECTION 4 SECTION 5 SECTION 7 Type of Notification/ **EPA Hazardous** Treatability Group: Manifest Envirite Subcategory Wastewater (WW) or Certification Waste Number Item# (if applicable) Approval # Nonwastewater (NWW) ("Waste Code") (fill in the blank) ww 11a X 3245 D002, D005, D007, Corrosive - Acid See section 8, 9 D008 See section Sec section See section SECTION 8 ... Underlying Hazardous Constituents (UHCs) (For each waste stream for which they must be identified, please identify all UHCs, or indicate that they are identified in an attachment to this form. Total Cyanide 8.0 mg/L Nickel 140 mg/L To be land disposed, this waste must meet applicable land disposal restriction treatment standards in 40 CFR 268 Subpart D. SECTION 9 FOLCHE Signature: Mu Printed Name: MELVIN I certify under penalty of law that I have personally examined and am familiar with the waste through analysis and testing or SECTION 10 through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR part 268 subpart D. I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment. Printed Name: Signature: I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the SECTION 11. hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment Signature: I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the SECTION 12 hazardous characteristic and that underlying hazardous constituents, as defined in § 268.2(i) have been treated on-site to meet the § 268.48 Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment

730 Vogelsong Road York, PA 17404 Phone: (717) 846-1900 Fax: (717) 854-6757

Signature:

Crenerator)



Attachment 5c

NONHAZARDOUS CERTIFICATION

This is to certify that **chromic acid** waste received **3-14-08**from **Eastern Plating Company, Baltimore, MD**on manifest # **001585039 FLE** has been rendered nonhazardous in full accordance with all applicable federal and state regulations.

S. Thomas Yablonski President

S. Thomas yabbula



REDERING RED

Attachment 5c

NONHAZARDOUS CERTIFICATION

This is to certify that **chromic acid** waste received **9-10-07**from **Eastern Plating Company, Baltimore, MD**on manifest # **001585992 FLE** has been rendered nonhazardous in full accordance with all applicable federal and state regulations.

S. Thomas Yablonski President

S. Thomas yabbonla



ENVIRITE OF PENNSYLVANIA, INC.

Technology For The Environment

Attachment 5c

NONHAZARDOUS CERTIFICATION

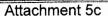
This is to certify that chromic acid received 10-7-05 from Eastern Plating Company, Baltimore, MD on manifest # PAH 171882 has been rendered nonhazardous in full compliance with the terms of Envirite Corporation's delisting authorization granted by the USEPA on November 6, 1986, and the State of Pennsylvania on April 29, 1992, and transferred to Envirite of Pennsylvania, Inc. effective January 1, 1997.

Having changed this hazardous waste into a nonhazardous material, Envirite of Pennsylvania, Inc. has eliminated all Eastern Plating Company future hazardous waste liability for this material under RCRA (Resource Conservation and Recovery Act of 1976).

S. Thomas Yablonski President

A. Thomas Yabbuli





NONHAZARDOUS CERTIFICATION

This is to certify that chromic acid received 7-6-04 from Eastern Plating Company, Baltimore, MD on manifest # PAH 027912 has been rendered nonhazardous in full compliance with the terms of Envirite Corporation's delisting authorization granted by the USEPA on November 6, 1986, and the State of Pennsylvania on April 29, 1992, and transferred to Envirite of Pennsylvania, Inc. effective January 1, 1997.

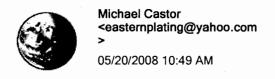
Having changed this hazardous waste into a nonhazardous material, Envirite of Pennsylvania, Inc. has eliminated all Eastern Plating Company future hazardous waste liability for this material under RCRA (Resource Conservation and Recovery Act of 1976).

S. Thomas Yablonski President

S. Thomas yabbuli



Technology For The Environment
730 Vogelsong Road York, PA 17404-1725



To Stacie Peterson/R3/USEPA/US@EPA

cc _Karen <ep_pulaski2@yahoo.com>, _Wellington Abhilashi <ep_labs@yahoo.com>

bcc

Subject Fwd: Re: December 11, 2007 Inspections - Certifications

Hello Stacie -

The attached file contains our Non-Hazardous Certification for the Chrome Hauls in 2006 and 2003.

Michael Castor <easternplating@yahoo.com> wrote:

Date: Mon, 19 May 2008 15:07:53 -0700 (PDT)

From: Michael Castor <easternplating@yahoo.com>

Subject: Re: December 11, 2007 Inspections - Part 2 of 2

To: Peterson.Stacie@epamail.epa.gov

CC: _Karen <ep_pulaski2@yahoo.com>, _Wellington Abhilashi <ep_labs@yahoo.com>

Here are the remaining two attachments.

Peterson.Stacie@epamail.epa.gov wrote:

Hello Mr. Castor. Thank you for providing the additional response. However, I still have a few more questions - This should be the last of them, but I can't make any promises.

Please provide a reponse to my questions by Monday, May 19th. If you have any further questions, please give me a call.

Thanks.

(See attached file: 58AdditionalQuestions.doc)

Stacie Peterson, Environmental Engineer
US EPA Region III - RCRA Compliance & Enforcement (3WC31)
1650 Arch Street
Philadelphia, PA 19103
(215)814-5173 - Phone
(215)814-3163 - Fax

Michael W. Castor President Eastern Plating Company, Inc. 410-342-4107 410-342-0105 fax

Michael W. Castor President **Eastern Plating Company, Inc.** 410-342-4107 410-342-0105 fax



2006-2003-Non-Hazardous Certification-Chrome0001.pdf

NONHAZARDOUS CERTIFICATION

This is to certify that chromic acid waste received 9-7-06
from Eastern Plating Company, Baltimore, MD
on manifest # 000011533 FLE has been rendered nonhazardous in full accordance with all applicable federal and state regulations.

S. Thomas yallowla

S. Thomas Yablonski President



ENVIRITE of Pennsylvania, Inc.

Technology For The Environment

NONHAZARDOUS CERTIFICATION

This is to certify that chromic acid waste received 7-10-03 from Eastern Plating Company, Baltimore, MD on manifest # PAG 294213 has been rendered nonhazardous in full accordance with all applicable federal and state regulations.

S. Thomas yabbuli

S. Thomas Yablonski President



ENVIRITE OF PENNSYLVANIA, INC.

Technology For The Environment

730 Vogelsong Road

York, PA 17404-1725